

1 A. Yes.

2 Q. Did you agree or disagree with the evaluation by  
3 your manager?

4 A. I agreed because I do believe I signed it. Yes.

5 Q. Just so it's clear, these appraisals are done on  
6 a database system; correct?

7 A. Yes, it is.

8 Q. So it's not actually a handwritten signature  
9 that you do? It's a computer acknowledgment of receiving  
10 it?

11 A. That's correct.

12 Q. And understanding it?

13 A. That's correct.

14 Q. You did authorize the computer to acknowledge  
15 that you had received and signed it?

16 A. Yes, yes.

17 Q. You received a rating of "3" or "Good" for this  
18 evaluation overall? It's the third last page.

19 A. Yes, I received a "3."

20 (Defendant's Exhibit 11 was marked for  
21 identification.)

22 BY MR. SEEGULL:

23 Q. I am now showing you what has been marked as  
24 Defendant's Exhibit 11. Do you see that?



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1 A. Yes, I do.

2 Q. This is your performance evaluation or appraisal  
3 for the following year?

4 A. Yes.

5 Q. This is for the period of April 1998 through  
6 March of 1999; correct?

7 A. Correct.

8 Q. Your direct supervisor was Sharon Walling;  
9 correct?

10 A. Yes.

11 Q. Again, you completed the information other than  
12 the headings up through page 6 where it starts "Review"?

13 A. Yes.

14 Q. Again, you did not list UNIX, Perl, Shell, or  
15 Dazel as any of your duties or responsibilities or  
16 anything of significant accomplishments in this review;  
17 correct?

18 A. I wouldn't say "anything of insignificant  
19 accomplishments." All of these were accomplishments, but  
20 no, UNIX or Perl is not there.

21 Q. Or Shell?

22 A. Or Shell.

23 Q. The reason you didn't list those is because they  
24 were not part of your duties or responsibilities and you



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1 didn't have any significant accomplishments with respect  
2 to those languages; is that correct?

3 A. I did not have any significant accomplishments  
4 with respect to programming them, but I did use UNIX,  
5 once again.

6 Q. But you just didn't list it?

7 A. I did not.

8 Q. Did you just forget again?

9 A. I must have. It is not here.

10 Q. Did you agree or disagree with this evaluation?  
11 Again, if you turn to the end, I think you received a  
12 "3," overall evaluation of "Good."

13 A. That's correct.

14 Q. Did you agree with this evaluation?

15 A. Yes, I did.

16 Q. That period ended in March of 1999, that review  
17 period; correct?

18 A. Correct.

19 Q. Then it was in the following fiscal year, 1999  
20 to 2000 time period, that you were transferred over to  
21 another group?

22 A. Yes. I was promoted into the Managed Print  
23 group. I wasn't transferred into it.

24 Q. You were transferred into another group. You're



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1 saying you got a promotion at the same time?

2 A. I wasn't transferred. I was promoted to Managed  
3 Print. And then Dawn took over the group at some point.

4 Q. Are you sure you weren't transferred?

5 A. Yes.

6 (Defendant's Exhibit 12 was marked for  
7 identification.)

8 BY MR. SEEGULL:

9 Q. I am now showing you what has been marked as  
10 Defendant's Exhibit 12. Do you recognize this?

11 A. Yes, I do.

12 Q. Do you see that you signed it on September 2nd,  
13 1999?

14 A. Yes, I do.

15 Q. Do you see you signed right beneath where it  
16 says "I accept the above CSC offer of transfer"?

17 A. Yes, I do.

18 Q. Do you agree you were transferred to another  
19 group?

20 A. Yes, I do.

21 Q. Now, I think your point was in addition to being  
22 transferred to the group you also got a promotion?

23 A. Yes. I didn't know they considered that a  
24 transfer, but now I do.



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Diane Poland

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1 Q. You were transferred to the GIS group?

2 A. Yes.

3 Q. GIS standing for Global Infrastructure Services?

4 A. Yes.

5 Q. Why did you consider it a promotion?

6 A. I was told at the time it was. It was a job  
7 opening that I went for. It was posted.

8 Q. You were promoted, you believe, from your  
9 position of -- what was your position before?

10 A. The help desk technician, technical service  
11 analyst.

12 Q. You were promoted to what position?

13 A. Managed Print technical service analyst.

14 Q. In connection with that promotion, you received  
15 an increase in starting salary?

16 A. I believe so, yes.

17 Q. In salary I should say.

18 A. Salary.

19 Q. Now, you remained a Member Technical Staff B;  
20 correct?

21 A. Correct.

22 Q. But you still considered it a promotion?

23 A. Yes.

24 Q. Why did you consider it a promotion?



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1 A. Because I was leaving the help desk.

2 Q. Why did you consider it a promotion to leave the  
3 help desk?

4 A. Because the help desk is first level, Managed  
5 Print is second level.

6 Q. Who made the decision to promote you?

7 A. I interviewed with Edwin or Derek, so I guess it  
8 was his decision.

9 Q. This is Edwin Alston?

10 A. Yes.

11 Q. Even though his name is Edwin, he goes by the  
12 name "Derek"?

13 A. Yes, he does.

14 Q. Is that a middle name?

15 A. Derek is his middle name, I think. Everyone  
16 called him Derek.

17 Q. So you interviewed with Mr. Alston?

18 A. Yes.

19 Q. He made the decision to promote you?

20 A. I believe so, yes.

21 Q. This was your transfer into the Managed Print  
22 Dazel group?

23 A. Well, at the time when I was hired by Derek, it  
24 was just called Managed Print group.



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Diane Poland

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1 Q. Why was Dazel not part of the title of the  
2 group?

3 A. I don't know.

4 Q. Did you use Dazel in that group?

5 A. At some point, yes.

6 Q. Okay.

7 A. Yes.

8 Q. So did the work ever change in the group or did  
9 just the title of the group change?

10 A. The work changed at some point, yes.

11 Q. How did the work change?

12 A. Well, like I said, we started out as Managed  
13 Print group and at some point they took over or  
14 incorporated Dazel into what we did daily.

15 Q. So when you first started, it was just called  
16 the Managed Print group because there was no Dazel work  
17 being done?

18 A. Not to my knowledge. It could have been. I  
19 don't know.

20 Q. At some point you became aware that they were  
21 doing Dazel in the group?

22 A. Correct.

23 Q. When you started in the group, you were not  
24 doing any Dazel work?



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1 A. Even if it's the same call.

2 Q. It just depends on who handles it?

3 A. It depends on who handles it.

4 Q. Now, when you went over to the Managed Print  
5 group, you had to use your UNIX?

6 A. Yes.

7 Q. And you had to use Dazel?

8 A. Yes.

9 Q. Or did you not use Dazel until later at some  
10 point?

11 A. At some point I did use Dazel, yes.

12 Q. Before you had to use Dazel, did you have to use  
13 Shell and Perl?

14 A. Yes, I had to use Shell. Not Perl. I used Perl  
15 along with Dazel.

16 Q. So Perl goes along with Dazel?

17 A. Correct.

18 Q. Shell and UNIX started from beginning in the  
19 Managed Print group?

20 A. Yes, yes.

21 Q. You programmed in those languages?

22 A. I programmed as well as I had to analyze  
23 problems with those languages.

24 Q. Now, how did you learn how to program in UNIX



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Diane Poland

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1 given that you've already said you hadn't programmed  
2 before in UNIX?

3 A. I taught myself. I bought a book. I did CBTs  
4 on-line and I could read it. I didn't have to program  
5 it, but I could read the programming language. I could  
6 read it and understand what it was supposed to do. So if  
7 there was an issue, I could analyze the program.

8 Q. You didn't actually program in UNIX, but you had  
9 to be able to understand the program?

10 A. At which level?

11 Q. In the Managed Print group.

12 A. Both. I had to do both.

13 Q. You had to program and understand the program?

14 A. Yes.

15 Q. The way you learned UNIX was you self-taught?

16 A. Yes.

17 Q. Meaning nobody else in the group helped you?

18 A. Oh, when I first came in the group, I was  
19 assisted by everyone there on how the group worked.

20 Q. Who assisted you?

21 A. At the time -- who was in the group? Paul White  
22 was in the group, Ted Mitchell, Larry Reimer, and  
23 MaryAnne Doll-Johnson.

24 Q. Paul White, Ted --



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1 A. To my knowledge, he stayed where he was.

2 Q. You just moved to a third building?

3 A. We moved to another building.

4 Q. So of the other individuals in the group -- Paul  
5 White, Ted Mitchell, Larry Reimer, and MaryAnne  
6 Doll-Johnson -- did any of them help you learn how to do  
7 your job?

8 A. They helped me to understand how Managed Print  
9 worked. I had already been doing some Managed Print work  
10 at the help desk, but they showed me, made sure I had  
11 access to the proper applications to insert my tickets  
12 and make sure I had access to the servers to troubleshoot  
13 problems, yes.

14 And if I had issues that arrived that I  
15 didn't know or questioned, I would ask Paul or MaryAnne  
16 or Ted or someone if they ever experienced this before.

17 Q. Did they all willingly help you?

18 A. Yes.

19 Q. Were they all friendly to you?

20 A. Yes.

21 Q. Did you have any problems with any of these  
22 employees?

23 A. No.

24 Q. Did you like all of them?



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1 A. Yes.

2 Q. Were they all skilled at what they did?

3 A. Yes.

4 Q. Did they all have extensive experience in these  
5 operating systems?

6 A. I don't know what their experiences was. I knew  
7 that they were already in the Managed Print team before I  
8 got there and they were doing the job.

9 Q. They were doing the job well?

10 A. I don't know about well. They were doing the  
11 job.

12 Q. You were not their manager, so you wouldn't  
13 know?

14 A. Exactly. I was not their manager.

15 Q. Do you know how long they had been in the  
16 Managed Print group before you got there?

17 A. No, I don't.

18 Q. Do you know what any of their experiences with  
19 UNIX or Dazel or Shell or Perl were?

20 A. No, not specifically. I know that they used it  
21 just like I did, but I don't know what their experiences  
22 were.

23 Q. Do you know what positions they held?

24 A. No. To my knowledge, we were all the same



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1 level.

2 Q. You were all MTSBs, you think?

3 A. I didn't know about the MTSB. I just knew we  
4 were all Managed Print.

5 Q. But you don't know what level they were?

6 A. No.

7 Q. You say you learned UNIX through a book you  
8 read?

9 A. Through a book, yes. And on-line, the web,  
10 different sources.

11 Q. CBTs?

12 A. CBTs, the web, whatever I needed to do.

13 Q. You bought the book with your own money?

14 A. Yes.

15 Q. When did you buy the book?

16 A. Oh, I don't know.

17 Q. How long after you joined the group did you buy  
18 it?

19 A. Maybe two, three months in.

20 Q. How long did it take you to read the book and --

21 A. I never read the book in total. I used the book  
22 when needed.

23 Q. You used the book more as reference?

24 A. Yes.



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1 Q. Then the fifth bullet point, "practice using  
2 UNIX command line on lsv9"?

3 A. Yes.

4 Q. All that's true?

5 A. Yes.

6 Q. Then in Week 5, the first bullet point was to  
7 "train more extensively with MaryAnne on utilizing  
8 Dazel"?

9 A. Yes.

10 Q. That's true, as well?

11 A. Yes.

12 Q. So it is true that Mrs. Doll-Johnson trained you  
13 on UNIX when you first joined the Managed Print group?

14 A. She trained me on a lot of UNIX, yes.

15 Q. She also trained you on Dazel?

16 A. She was one of the persons, yes.

17 Q. Who were the other people that trained you on  
18 Dazel?

19 A. Peter Lang, he was an employee, but he was  
20 stationed in Europe. He was very efficient in Dazel, as  
21 well.

22 Q. Was there anybody else that trained you in UNIX  
23 or Dazel?

24 A. No.



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1 Q. Did you agree with your performance evaluation?

2 A. Yes, I did.

3 Q. Following your performance evaluation, you  
4 received a promotion?

5 A. Yes, I did.

6 Q. You were promoted from a Member Technical  
7 Staff B to a Member Technical Staff A?

8 A. Yes.

9 Q. That promotion was effective in May of 2000?

10 A. Yes.

11 (Defendant's Exhibit 14 was marked for  
12 identification.)

13 BY MR. SEEGULL:

14 Q. I'm now showing you what's been marked as  
15 Defendant's Exhibit 14. Do you recognize this?

16 A. No, I don't.

17 Q. This is a job description for a Member Technical  
18 Staff A; correct?

19 A. That's what it says, yes.

20 Q. You've never seen this before?

21 A. No, I haven't.

22 Q. Could you read this job description and tell me  
23 if it accurately reflects your job duties and  
24 responsibilities and level of competencies?



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1 you should not expect to be promoted any time soon  
2 because you had a limited period of time in your  
3 position?

4 A. No.

5 Q. He didn't say that?

6 A. Not that I recall.

7 Q. You're not denying that he said that?

8 A. No, I'm not.

9 Q. Now, it was during this following year that you  
10 began to be managed by Dawn Dworsky?

11 A. Sometime in between. I don't even know that it  
12 was a full year, but at some point I was managed by Dawn.

13 Q. Would it make sense to you that this shift  
14 occurred shortly after this evaluation in May or June of  
15 2000?

16 A. Yes, that would make sense.

17 Q. That sounds right?

18 A. That sounds about right.

19 Q. Now, who was in the group during this transfer?

20 A. The same people: myself, MaryAnne Doll-Johnson,  
21 Ted Mitchell, Larry Reimer, and Paul White.

22 Q. Anybody else?

23 A. No.

24 Q. How was Dawn Dworsky as a supervisor?



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1 A. Yes, he did.

2 Q. How often did he meet with you?

3 A. I don't remember, but more so. And I didn't  
4 have to request several times. He would contact me as my  
5 manager.

6 Q. That's what you considered to be the  
7 discrimination?

8 A. No, that's not -- no, not at all.  
9 Discrimination, Dawn discriminated against me.

10 Q. No, no. But in other words, Derek would meet  
11 with you more often?

12 A. That's not the discrimination for me, no. Derek  
13 did meet with me more often, yes.

14 Q. After Miss Dworsky became your supervisor, your  
15 job didn't change in any substantial way, did it?

16 A. No, not in any substantial way.

17 Q. Your duties continued to be the same?

18 A. That's correct.

19 Q. Do you know if Miss Dworsky's expectations  
20 changed?

21 A. I found out her expectations changed when I had  
22 a meeting with her and Maureen Summers.

23 Q. How were her expectations different than  
24 Mr. Alston's?



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1 A. No.

2 (Defendant's Exhibit 15 was marked for  
3 identification.)

4 BY MR. SEEGULL:

5 Q. Miss Poland, I'm now showing you your  
6 performance evaluation that's marked as Defendant's  
7 Exhibit 15, and it's your evaluation for the period of  
8 April of 2000 through March of 2001. Do you recognize  
9 this?

10 A. Yes, I do.

11 Q. That's what it is; correct?

12 A. Yes.

13 Q. Again, you completed all of the information  
14 through and including page 8?

15 A. Yes.

16 Q. Did Mr. Alston, when he met with you to discuss  
17 your concerns about Ms. Dworsky, did he ask you to take  
18 notes of your conversations with Ms. Dworsky?

19 A. No.

20 Q. Didn't he tell you to write down what your  
21 expectations were and try to meet her expectations?

22 A. No.

23 Q. You're not denying that he said that?

24 A. No, I'm not.



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1 Q. This performance evaluation in Defendant's  
2 Exhibit 15, that was conducted by and the review was  
3 filled out by Ms. Dworsky?

4 A. That's correct.

5 Q. At the point in which she filled this out, you  
6 had been an MTSA for one year; correct?

7 A. Yes.

8 Q. She gave you a ranking of what?

9 A. A 3.

10 Q. That equated to a ranking of "Good"?

11 A. That's correct.

12 Q. She said that your performance consistently  
13 meets expectations and job requirements?

14 A. Where are you reading that at?

15 Q. I'm sorry. On page 13, you see the ranking of  
16 "3"?

17 A. Yes.

18 Q. "Good" corresponds to the 3 and she rated you as  
19 your performance consistently meets expectations and job  
20 requirements?

21 A. That's correct.

22 Q. She also was saying that you may exceed  
23 expectations from time to time?

24 A. Yes.



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Diane Poland

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1 Q. Now, did you agree with this evaluation?

2 A. Yes, I did, with objections, and I think I noted  
3 them. Let's see. Actually, I didn't. No, I didn't.

4 Q. You didn't have any objections to this  
5 evaluation?

6 A. Yes, I did. That's why I didn't sign it.

7 Q. Didn't we go through this? You just have to  
8 approve the form; correct?

9 A. That's correct, and I hadn't approved it.

10 Q. Why didn't you approve it?

11 A. Because I didn't agree with Dawn's evaluation at  
12 all.

13 Q. You didn't think you were good?

14 A. I thought I was better than good.

15 Q. You thought you deserved better than good?

16 A. That's correct.

17 Q. This was the same rating that you had received  
18 on your first two evaluations from Miss Hauck and  
19 Ms. Walling?

20 A. I believe so.

21 Q. You received an increase in pay at this time;  
22 correct?

23 A. Yes, I did.

24 Q. Your increase in pay by 5 percent; correct?



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1 A. I believe so. I don't remember exactly.

2 Q. Do you know how merit raises are done by  
3 Computer Sciences Corporation?

4 A. No, I don't.

5 Q. Do you know if there's a chart that corresponds  
6 to what somebody's rating is to what their salary  
7 increase will be?

8 A. No, I don't.

9 Q. You've never seen anything like that?

10 A. I seen something, but I don't know if it's  
11 exactly what you are talking about.

12 Q. So you're not familiar with the fact that the  
13 company had a policy as to how much of a salary increase  
14 could be given to an employee based upon their rating in  
15 the performance evaluation?

16 A. No.

17 Q. You never heard that?

18 A. I heard it, but I don't know that I seen  
19 paperwork on it.

20 Q. Do you know what raises other employees were  
21 given as a result of their evaluations?

22 A. No.

23 Q. You have no idea what other employees got in  
24 Ms. Dworsky's group?



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Diane Poland

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1 A. No.

2 Q. Do you know what other employees are paid within  
3 Ms. Dworsky's group?

4 A. Only as a result of the paperwork I received  
5 from the Department of Labor. Prior to that, no.

6 Q. By the way, you said when you first went to the  
7 Department of Labor you did not complain about this equal  
8 pay issue between the males and the females; correct?

9 A. Correct.

10 Q. And that it was the Department of Labor that  
11 told you that you were being discriminated against  
12 because the males were paid more than the females?

13 A. Yes.

14 Q. The reason that you didn't complain about that  
15 when you first went to the Department of Labor, is that  
16 because you didn't know what people were paid?

17 A. I did not know.

18 Q. So you would have no way of even guessing that  
19 there was such sex discrimination?

20 A. I could guess, but I would not know.

21 Q. What rating do you believe you deserved on the  
22 performance evaluation? You said you didn't believe you  
23 deserved a 3?

24 A. Correct.



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1 Q. Do you believe you deserved a 2 or a 1?

2 A. A 2.

3 Q. Do you know what the raise would have been if  
4 you had received a 2?

5 A. No, I don't.

6 Q. Were you concerned about the amount of the  
7 raise, or were you concerned about the rating?

8 A. What do you mean?

9 Q. What was it that bothered you about the rating  
10 of 3? Was it that you felt you deserved to have a higher  
11 rating but you didn't care about the amount of money that  
12 equated to, or were you concerned about the money, that  
13 you felt because you weren't given a higher rating you  
14 weren't going to get as much of an increase?

15 A. I was concerned about the rating.

16 Q. It wasn't the money?

17 A. Because I worked very hard.

18 Q. You weren't concerned about the money?

19 A. I wouldn't say it didn't cross my mind, but I  
20 was concerned about the rating.

21 Q. That's really what you were most concerned  
22 about?

23 A. Yes.

24 Q. Why do you think it mattered in your mind what



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1 A. I don't know.

2 Q. You received a rating of 3 in 2001; correct?

3 A. Correct.

4 Q. Your salary increase was 5 percent; correct?

5 A. That's correct.

6 Q. Do you know who had to approve an exception to  
7 these guidelines?

8 A. No.

9 Q. These guidelines also reflect the percentage of  
10 the employee population that should be given any  
11 particular rating; correct?

12 A. I don't know.

13 Q. That's what the middle --

14 A. That's what it says.

15 Q. So you would agree that you received a salary  
16 increase higher than the recommended salary increase by  
17 human resources?

18 A. Yes.

19 Q. And higher than what was given to other  
20 employees of the same rating?

21 A. I have no idea.

22 Q. Isn't it true that Dawn Dworsky had to recommend  
23 you for a higher salary increase?

24 A. I don't know.



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1 idea of when or how or if I would get there.

2 Q. You were upset that you had not been promoted at  
3 that time?

4 A. I was upset, yes.

5 Q. You were in the position of MTSB for three years  
6 before you were promoted to MTSA; correct?

7 A. Yes.

8 Q. Ms. Dworsky was not telling you that you would  
9 not be promoted?

10 A. No.

11 Q. She was telling you that you would be promoted,  
12 just not right away?

13 A. No, she didn't say that, either. She just told  
14 me that I was on the right career path and I should  
15 continue what I'm doing.

16 Q. Did she tell you that there was a possibility of  
17 your promotion next year?

18 A. No, she didn't.

19 Q. What did she say about the following year, what  
20 would happen the next year?

21 A. She didn't say what happened next year. That  
22 was my rating. This was her determination and we'll see  
23 going forward.

24 Q. She told you that she couldn't promote too many



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1 people at once?

2 A. She did say that.

3 Q. She had budget limitations?

4 A. Something to that effect, yes.

5 Q. You would agree that Ms. Dworsky was not waiting  
6 an excessively long amount of time to promote you to the  
7 next position?

8 A. I don't know if she was waiting to promote me at  
9 all.

10 Q. She had not waited an excessively long period of  
11 time to promote you; correct?

12 A. I don't know because I never got promoted, so I  
13 don't know. What do you mean by excessive?

14 Q. From this perspective, you had not been in the  
15 MTSA position for a long time?

16 A. I had been in the position for one year.

17 Q. That's not a long time, is it?

18 A. It's a year. It's relative if it's long. It's  
19 not long to me.

20 Q. It's not long to you?

21 A. No. It's a year.

22 Q. It's not like you had been in the same position  
23 for ten years and still hadn't received a promotion;  
24 right?



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1 A. That's correct.

2 Q. You had only been in the position one year?

3 A. I had been in the position one year.

4 Q. It was not out of the ordinary for people to be  
5 in a position for more than one year before they were  
6 promoted?

7 A. I don't know.

8 (Defendant's Exhibit 17 was marked for  
9 identification.)

10 BY MR. SEEGULL:

11 Q. I'm now showing you what's been marked as  
12 Defendant's Exhibit 17. Do you recognize this?

13 A. It looks familiar, yes.

14 Q. This is the chart that Ms. Dworsky showed you  
15 regarding her expectations for promotion from an MTSA to  
16 an SMTS?

17 A. It looks like it.

18 Q. This reflected what her expectations were for  
19 each of these positions; correct?

20 A. I believe so.

21 Q. Do you know if she created this just for you or  
22 for all the employees in her group?

23 A. I don't know. I know I hadn't seen it till  
24 after my appraisal.



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1 mean, what the far left column of Rate 1, Rate 2, Rate 3  
2 means?

3 A. No, I don't.

4 Q. Do you know if this has anything to do with  
5 ratings?

6 A. No, I don't.

7 Q. A manager has the right to evaluate two  
8 different employees and to decide amongst those employees  
9 who is deserving of promotion; correct?

10 A. I guess so.

11 Q. That's a business judgment; correct?

12 A. I would assume so, yes.

13 Q. A manager who is considering two different  
14 candidates for promotion, you would agree they can  
15 consider that employee's experience as a factor in  
16 deciding whether or not to promote them?

17 A. Yes.

18 Q. Education and seniority in a position are proper  
19 considerations for promotion decisions?

20 A. Yes.

21 Q. You would also agree that having a certification  
22 in a particular area does not necessarily equate with  
23 on-the-job experience?

24 A. Yes.



Diane Poland

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1 A. I don't know if I can even answer that. I don't  
2 think so. I don't know.

3 Q. You don't know one way or another?

4 A. I don't know exactly.

5 MR. SEEGULL: Why don't we take a lunch  
6 break?

7 (A luncheon recess was taken at this time.)

8 BY MR. SEEGULL:

9 Q. Miss Poland, I want you to tell me about the  
10 conversations you had with Ms. Dworsky about the salary  
11 issues.

12 A. Which conversation?

13 Q. How many conversations did you have with her  
14 about salary and promotion?

15 A. Several. I don't remember how many over the  
16 year. Several.

17 Q. Approximately how many?

18 A. Approximately maybe four, five.

19 Q. Would these have been in the May to July of 2001  
20 time frame?

21 A. Some were.

22 Q. When were the others?

23 A. Prior to that.

24 Q. Did you have any conversations with her about



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1 with Maureen or Sonia or someone else from HR.

2 Q. You believe after you received the evaluation  
3 you never met again with her one-on-one?

4 A. No, I didn't.

5 Q. How many times did you meet with her with  
6 Maureen present?

7 A. Several. I don't remember how many. Quite a  
8 few.

9 Q. One? Two? Three? Five? Ten? Any  
10 approximation? Or you just don't know?

11 A. Anywhere between, maybe, one, maybe more than  
12 ten.

13 Q. Anywhere between one and more than ten? You  
14 don't know?

15 A. Possibly, yes. I know it's more than once.

16 Q. Was it more than twice?

17 A. Yes.

18 Q. Was it more than five times?

19 A. Possibly.

20 Q. Do you know how many times you met with her?

21 A. I'm not sure.

22 Q. How many times did you meet with Dawn Dworsky  
23 with Sonia Koplowicz present?

24 A. Maybe less than five times.



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1 Q. At some of those meetings was Maureen Summers  
2 present?

3 A. At some, yes.

4 Q. But at some she wasn't?

5 A. Correct.

6 Q. Tell me about all of the meetings you met with  
7 Dawn Dworsky whether Maureen was present, whether Sonia  
8 was present, or whether both of them were present?

9 A. I don't remember all the meetings, but I do know  
10 they all centered around my appraisal.

11 Q. Tell me about the meetings. What do you  
12 remember?

13 A. I remember that once I had to always reiterate  
14 that I didn't agree with the appraisal. I had to  
15 reiterate that I didn't agree with them giving me  
16 expectations later or after the appraisal. I didn't  
17 agree with them not promoting me. And I didn't agree  
18 with Sonia and Maureen agreeing with Dawn in her  
19 treatment of me.

20 Q. Let's just go through this.

21 First you said you didn't agree with the  
22 appraisal?

23 A. Mm-hmm.

24 Q. Yes?



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1 A. Yes. I'm sorry. Yes.

2 Q. You said you wanted to be rated a 2?

3 A. Yes.

4 Q. She had rated you a 3?

5 A. Correct.

6 Q. You said this was unfair?

7 A. Yes.

8 Q. Did you say anything else?

9 A. Yes.

10 Q. What else did you say?

11 A. I told her I didn't agree with it and I wanted  
12 her to reevaluate the appraisal and she refused.

13 Q. She said this is your rating, this is what I  
14 rated you, this is how I viewed your performance and I'm  
15 not changing it?

16 A. In essence, yes.

17 Q. Words to that effect?

18 A. Words to that effect.

19 Q. How did you respond?

20 A. I told her I didn't agree with her.

21 Q. Anything else?

22 A. Possibly, but I know I didn't agree with her.

23 Q. But you don't recall saying anything else?

24 A. I know I did, but I don't recall what it was.



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1 answer was no answer, pretty much, that they agree I  
2 would have it, but never knew when.

3 Q. Was anything else discussed about salary?

4 A. Not that I can recall.

5 Q. So we talked about the performance appraisal,  
6 we've talked about your conversations about the  
7 expectations, and we talked about your conversations  
8 about salary; correct?

9 A. Yes.

10 Q. Were there any other conversations you had with  
11 Dawn Dworsky, Maureen Summers, or Sonia Koplowicz?

12 A. Salary -- we talked about my not getting the  
13 promotion to SMTS.

14 Q. Tell me about that conversation and who was  
15 involved.

16 A. Sonia, Maureen, and Dawn.

17 Q. Was this in one conversation or multiple?

18 A. Multiple.

19 Q. Tell me about what was discussed.

20 A. Generally we always discussed that I, from their  
21 opinion, I was not qualified to be an SMTS.

22 Q. You were not ready?

23 A. That's what they said.

24 Q. What did you say?



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Diane Poland

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1 A. I said I was.

2 Q. Did you say I think I am or I think I can be?

3 A. No, I didn't. I believe I deserved to be an  
4 SMTS.

5 Q. They said, well, we don't think you're ready?

6 A. Yes.

7 Q. Or Dawn said I don't think you're ready and the  
8 others agreed?

9 A. Pretty much that's how it was.

10 Q. Did Dawn say why she felt you weren't ready to  
11 be promoted to an SMTS?

12 A. She gave me several different reasons, one being  
13 that she only could promote a certain number of people,  
14 she had a certain budget. Something along those lines.  
15 And the fact that she didn't think that I had the skill  
16 set to move on to SMTS.

17 Q. Did she say what in your skills did not meet her  
18 expectations for an SMTS?

19 A. Not that I can recall.

20 Q. You're not denying that she went into more  
21 detail, are you?

22 A. No, I'm not.

23 Q. You just don't recall what she said about that?

24 A. No.



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1 Q. Is that correct?

2 A. That's correct.

3 Q. You said you had conversations with Mike Suman?

4 A. Yes, I had.

5 Q. How many conversations did you have with him?

6 A. Not many. Maybe two or three.

7 Q. Tell me about those conversations.

8 A. They were with regard to at some point Dawn  
9 wanted me to do a Dazel manual, to write a Dazel manual,  
10 which I was assigned to do, and at that point all the  
11 engineering projects I was working on were taken away.  
12 And we met with Mike because I did not believe in a  
13 statement that Maureen and Dawn said to me that the  
14 projects were complete.

15 And so I met with Mike and Dawn at  
16 Maureen's request to resolve that issue. And when I went  
17 into the meeting, we discussed pretty much Mike saying  
18 whatever Dawn says is it and anything discussed prior to  
19 that is erased, it does not count, it does not matter.

20 Q. I'm not following you, so you are going to have  
21 to help me out.

22 First of all, what is a Dazel manual?

23 A. It's something I had to write.

24 Q. What is it?



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1 Q. Isn't it true that Mr. Miller was a member of  
2 the GIS group when he was transferred into Dazel?

3 A. I have no idea.

4 Q. He was a member of the test and integration  
5 team?

6 A. I don't know.

7 Q. Do you know anything about his technical  
8 experience prior to coming on the group?

9 A. No.

10 Q. Do you know when he first met Ms. Dworsky?

11 A. No.

12 Q. Do you know if they even knew each other prior  
13 to his transfer to the group?

14 A. Yes.

15 Q. How do you know that?

16 A. Because they've said it.

17 Q. What did he say?

18 A. That they were friends. I don't remember  
19 exactly the terminology he used.

20 Q. Do you know if they ever socialized outside of  
21 the office?

22 A. I don't know.

23 Q. Let's talk about Miss Daigger. Do you know what  
24 position Miss Daigger had prior to her joining the Dazel



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1 A. I don't know.

2 Q. Certainly a manager has the right to hire  
3 employees that they know prior to working with them?

4 MR. MARTIN: Objection.

5 A. I don't know.

6 Q. Were you ever disciplined by any of your  
7 supervisors?

8 A. No.

9 Q. Did Mrs. Dworsky ever discipline you?

10 A. No.

11 Q. Now, you applied for a position at some point in  
12 the chemical group, a managerial position; correct?

13 A. Correct.

14 Q. You applied for a position with Beth Musumeci?

15 A. Yes.

16 Q. Who is Beth Musumeci?

17 A. I don't know. She's a manager at CSC. That's  
18 all I really know. I know she's a manager at CSC.

19 Q. In what group is she a manager?

20 A. I don't know.

21 Q. When did you apply for this position?

22 A. I don't remember when, but some time ago.

23 Q. Did you know Ms. Musumeci prior to the time you  
24 applied for the position?



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1 A. No.

2 Q. Do you recall what the title for that position  
3 was?

4 A. No, not specifically.

5 Q. Was it leverage server administrator supervisor?

6 A. Possibly. I don't remember.

7 Q. It was a supervisor position; correct?

8 A. It was, yes.

9 Q. At the time that you applied for the position,  
10 had you ever held a supervisory title in the past?

11 A. No.

12 Q. You didn't have any management experience;  
13 correct?

14 A. Correct.

15 Q. The position did not require UNIX experience;  
16 correct?

17 A. I don't recall.

18 Q. Or Dazel experience?

19 A. I don't recall.

20 Q. Now, prior to the interview with Miss Musumeci,  
21 do you know who spoke to Miss Musumeci on your behalf?

22 A. No.

23 Q. Do you know if anybody recommended you for the  
24 position?



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1 A. No.

2 Q. You did interview for the position?

3 A. Yes, I did.

4 Q. With Ms. Musumeci?

5 A. Yes.

6 Q. Did you interview with anyone else for the  
7 position?

8 A. I had an interview with Beth and there were  
9 several people at the table, but I don't remember all the  
10 people at all.

11 Q. You were offered the position; correct?

12 A. Yes.

13 Q. You didn't take it?

14 A. No, I did not.

15 Q. Why didn't you take the position?

16 A. After speaking with Beth on several occasions,  
17 she told me that the increase that I was getting for the  
18 job had a cap at a certain level, and it also  
19 incorporated a percentage that Dawn had to send over to  
20 transfer or -- I don't know what the process was, but it  
21 was incorporation of a percentage of what Dawn said and a  
22 percentage of what Beth said as a hiring manager. And it  
23 was, I think -- I don't know, I think it was 3 percent  
24 from Dawn and 5 percent from Beth.



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1 Q. Didn't you ask Ms. Musumeci about the salary  
2 increase?

3 A. Yes, I did.

4 Q. She told you that the salary you were offered  
5 was well within the applicable range of salary for that  
6 position?

7 A. Something to that effect.

8 Q. You're not denying that it was within the range  
9 applicable for that position; correct?

10 A. I'm not denying it because I don't know. I  
11 don't know what the range was.

12 Q. Now, you rejected the offer because you felt the  
13 salary increase was too low; correct?

14 A. Correct.

15 Q. Isn't it true that you demanded a salary  
16 increase of 36 percent?

17 A. No, I don't recall that at all.

18 Q. Don't you recall stating that you wanted a  
19 \$63,000 salary?

20 A. No, I don't recall.

21 Q. Did you ever give her a specific number of what  
22 you wanted the salary to be?

23 A. No, I don't recall doing that at all.

24 Q. You never said \$63,000?



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1 Q. What was your expectation with regard to salary?

2 A. I don't remember. It was regards -- depending  
3 on the job and the range, but I don't remember  
4 specifically doing another offer with her or anything  
5 like that.

6 Q. You're not denying that you said you wanted a  
7 salary of \$63,000?

8 A. I'm saying I don't recall doing that at all.

9 Q. But you don't deny that?

10 A. I don't deny it.

11 Q. Isn't it true that if you had taken this  
12 position, you would have remained an MTSA; correct?

13 A. I don't know. I don't know.

14 Q. Did anybody tell you you would become an SMTS if  
15 you took this position?

16 A. No.

17 Q. Have you ever heard of anybody receiving a  
18 36 percent salary increase for a promotion?

19 A. Not that I can recall.

20 Q. Do you believe it's reasonable for somebody to  
21 accept a 36 percent salary increase for a lateral  
22 transfer?

23 A. Accept it, yes.

24 Q. To expect a -- if I said "accept," I apologize.



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1 Do you believe it is reasonable for an  
2 employee to expect a 36 percent salary increase for a  
3 lateral transfer?

4 A. I don't -- I don't know. I don't think so.

5 Q. After you rejected this offer, Ms. Musumeci came  
6 back to you with another offer; correct?

7 A. I believe so.

8 Q. She increased the salary offer?

9 A. I believe so.

10 Q. She increased it to 8 percent; correct?

11 A. I believe so, yes.

12 (Defendant's Exhibit 19 was marked for  
13 identification.)

14 BY MR. SEEGULL:

15 Q. I am now showing you what has been marked as  
16 Defendant's Exhibit 19. This is the revised offer  
17 letter; correct?

18 A. Correct.

19 Q. This is the offer that Ms. Musumeci came back  
20 with after you said the original salary increase was too  
21 low?

22 A. That's correct.

23 Q. She increased the salary, if you had taken the  
24 position, to \$50,757?



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Diane Poland

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1 A. That's correct.

2 Q. That would have been an 8 percent increase?

3 A. I believe so.

4 Q. That was still too low for you; correct?

5 A. Yes.

6 Q. Do you know who determined the salary increase  
7 that was offered to you?

8 A. No, I don't know who determined it.

9 Q. Do you think that Beth Musumeci discriminated  
10 against you in any way?

11 A. No, I don't.

12 Q. Did she ever tell you how the salary increase  
13 offer was determined?

14 A. I believe so, but I don't remember exactly  
15 everything she said. I did know it came from the hiring  
16 department and from the department you would be  
17 transferring from, there was something there, but I don't  
18 know the formula.

19 Q. Was she saying I'm justifying it based upon what  
20 your salary increase would be if you had stayed in your  
21 current position with Dawn Dworsky plus what I'm willing  
22 to offer you, words to that effect?

23 A. Maybe.

24 Q. Does that sound familiar?



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1 started in the position?

2 A. No, I don't.

3 Q. Do you know how long MaryAnne Doll-Johnson had  
4 been an MTSA before she was promoted to an SMTS?

5 A. No, I don't.

6 Q. Do you think Ms. Doll-Johnson deserved a  
7 promotion to an SMTS?

8 A. Yes.

9 Q. Why do you think that?

10 A. Because I worked with her.

11 Q. What about working with her leads you to believe  
12 that she deserved the promotion?

13 A. She's very efficient, very smart lady.

14 Q. Did you get along with her well?

15 A. Yes.

16 Q. Did that ever change?

17 A. Yes.

18 Q. When did that change?

19 A. When I began having problems with Dawn and HR.

20 Q. How long had Ms. Doll-Johnson been working in  
21 the Dazel and Managed Print group before she was promoted  
22 to SMTS?

23 A. I don't know.

24 Q. Would you agree that she had more experience



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1 than you did in that position?

2 A. Yes, yes.

3 Q. Would you agree that she had more UNIX  
4 experience than you did?

5 A. Yes.

6 Q. Would you agree that she had more experience in  
7 Dazel software --

8 A. Yes.

9 Q. -- than you did?

10 A. Yes.

11 Q. Were you ever told that Ms. Doll-Johnson was  
12 promoted, at least in part, on the basis of seniority?

13 A. No.

14 Q. How long had Randall Miller been an MTSA before  
15 he was promoted to SMTS?

16 A. I don't know.

17 Q. Would you agree that Mr. Miller had more  
18 experience related to the position than you did?

19 A. I don't know.

20 Q. Would you agree that he had more technical  
21 experience than you did?

22 A. I don't know.

23 Q. Do you think Mr. Miller should not have been  
24 promoted?



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1 him?

2 A. No.

3 Q. Do you know what factors they considered in  
4 deciding whether or not to promote him?

5 A. No.

6 Q. Are you saying that you should have been  
7 promoted in lieu of Mr. Miller, or just that he shouldn't  
8 have been promoted at all?

9 A. I can't say that. I don't know.

10 Q. If you had been promoted, would there have been  
11 anything wrong with promoting him, as well?

12 A. I don't know.

13 Q. Are you saying you don't know whether or not he  
14 deserved to be promoted, but you know that you did  
15 deserve to be promoted?

16 A. Yes.

17 Q. So you're not saying he didn't deserve to be  
18 promoted? You're only saying that you did deserve to be  
19 promoted?

20 A. Yes.

21 Q. In fact, you would agree that he did deserve to  
22 be promoted?

23 A. No, I would not.

24 Q. You just don't know one way or the other?



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1 A. Exactly.

2 Q. I'm sorry. You don't know one way or other  
3 whether or not he deserved to be promoted?

4 A. I don't know.

5 Q. Now, at some point you expressed an interest in  
6 being transferred out of the Dazel and Managed Print  
7 group; right?

8 A. Yes.

9 Q. That was in the July/August 2001 time frame?

10 A. Sometime after that I began having problems with  
11 Dawn and HR, yes.

12 Q. That was in the July time frame?

13 A. Possibly, yes.

14 Q. Does that sound about right?

15 A. Sounds about right.

16 Q. You met with a number of people about that; is  
17 that correct?

18 A. Yes.

19 Q. You met with Sonia Koplowicz, Maureen Summers,  
20 Dawn Dworsky, Mike Suman, and Leanne Thomas?

21 A. Yes.

22 Q. Did you meet with anybody else about that?

23 A. Not that I can recall.

24 Q. You told various people that there were certain



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1 things you did not want in terms of another position;  
2 correct?

3 A. I don't recall. I don't know.

4 Q. Didn't you tell people you were not interested  
5 in any support positions including the UNIX support  
6 position?

7 A. It's possible. I don't remember.

8 Q. Didn't you also tell people that you wouldn't  
9 take a position that required any travel?

10 A. That's possible.

11 Q. Does that ring a bell?

12 A. Somewhat.

13 Q. You also told people that you would not take a  
14 position with the eBusiness group because it required  
15 rotational shift work?

16 A. That's possible. I don't recall. I don't  
17 recall.

18 Q. You also told some people that you would not  
19 consider certain projects because of the travel time  
20 associated with it?

21 A. That's possible.

22 Q. Didn't you also say you needed a position with  
23 part-time hours due to your medical condition?

24 A. That's possible.



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Diane Poland

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1 Q. Wasn't there also communication you had with  
2 Sonia Koplowicz in which you said that you were aware  
3 that CSC had a very tight status on open positions, that  
4 there weren't a lot of open positions?

5 A. I don't recall that conversation.

6 Q. You're not denying that you had that  
7 communication, though?

8 A. No, I'm not.

9 Q. Didn't Ms. Koplowicz tell you that human  
10 resources was committed to helping you find another  
11 position?

12 A. Yes, she did.

13 Q. Ms. Summers told you the same thing?

14 A. No.

15 Q. Did Ms. Summers say anything about that?

16 A. Not really, no. I never really had that  
17 conversation with Miss Summers.

18 Q. You mean you didn't really have many  
19 conversations with Miss Summers about transferring to  
20 another position?

21 A. That's correct.

22 Q. On several occasions didn't you inform  
23 Miss Koplowicz that there were several positions you were  
24 interested in?



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1 A. Yes.

2 Q. Open positions?

3 A. I believe they were open because they were on  
4 the database.

5 Q. Miss Koplowicz asked to you send requisition  
6 numbers?

7 A. Yes.

8 Q. She said once I have these requisition numbers,  
9 she would then contact the hiring managers in order to  
10 facilitate an interview?

11 A. That sounds familiar, yes.

12 Q. You didn't provide Miss Koplowicz with  
13 requisition numbers; correct?

14 A. That's incorrect. Yes, I have.

15 Q. Which requisition numbers did you provide her  
16 and when did you provide them?

17 A. I don't recall, but I did.

18 Q. Would that have been in writing?

19 A. It should be, yes.

20 Q. So if you have those requisition numbers, you  
21 produced those to us in discovery?

22 A. Yes, I should have.

23 Q. If we don't have them in discovery, that means  
24 you didn't provide it; correct?



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1 A. I don't know. If you don't have them, I don't  
2 know.

3 Q. If you didn't produce them in discovery, that  
4 means you didn't provide the requisition number?

5 A. If I didn't.

6 Q. Correct?

7 A. If I didn't, yes.

8 Q. Do you recall which positions you provided  
9 requisition numbers for, if you did?

10 A. No, I don't.

11 Q. Do you recall which positions you were  
12 interested in?

13 A. No. There were a couple, but I don't recall  
14 them.

15 Q. There was an open position in the Applications  
16 Interconnect Services group. Do you remember that?

17 A. Possibly.

18 Q. You expressed interest in this to Dahl Landers,  
19 D-a-h-l?

20 A. That sounds familiar.

21 Q. Did this position involve UNIX in any way?

22 A. I don't remember.

23 Q. You expressed interest in this position about  
24 August of 2001?



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1 A. Could be.

2 Q. Isn't it true you scheduled two interviews with  
3 Miss Landers; correct?

4 A. Yes.

5 Q. And cancelled both of them?

6 A. That I don't recall, but I do remember having  
7 meetings scheduled with her.

8 Q. You're not denying that you canceled two  
9 meetings with her?

10 A. I'm not denying it. I just don't remember.

11 Q. You never called to explain why you cancelled  
12 the meetings, did you?

13 A. I don't remember.

14 Q. Do you recall that Dawn Dworsky told you in  
15 November of 2001 about an open position in the AIS group  
16 with Miss Landers?

17 A. I don't recall, but I know there was something.

18 Q. Do you recall that she advised you that it might  
19 be a good opportunity for you and she was recommending  
20 that you apply for that position?

21 A. No, but it's possible.

22 Q. Do you recall that Ms. Landers sent you a link  
23 to the applicable job posting?

24 A. I do believe so.



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